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Attorneys for Defendant
Experian Information Solutions, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

THOMAS FOSKARIS,

Plaintiff,

v.

EXPERIAN INFORMATION SOLUTIONS,
INC.,

Defendants.

Case No. 2:17-cv-00506-KJD-PAL

**STIPULATION TO CONTINUE
DISPOSITIVE MOTION DEADLINE
(Third Request)**

Complaint Filed: February 20, 2017

Defendant Experian Information Solutions, Inc. ("Experian"), by and through its counsel of record, and Plaintiff Thomas Foskaris ("Plaintiff"; collectively, "the parties"), by and through his counsel of record, hereby submit this stipulation to extend the dispositive motion deadline contained in the scheduling order entered on August 11, 2017 (ECF No. 29) pursuant to LR IA 6-1 and LR 26-4.

1 This is the parties' second stipulation, and Plaintiff's third request, to continue the
2 dispositive motion deadline in this matter. On May 31, 2017, the Court entered a scheduling
3 order setting the dispositive motion deadline as December 19, 2017. (ECF No. 16.) On
4 August 11, 2017, the Court granted the parties' joint stipulation to extend the dispositive motion
5 deadline to March 14, 2018. (ECF No. 29.) On March 6, 2018, the Court denied Plaintiff's
6 motion to extend case deadlines, including the dispositive motion deadline. (ECF No. 93.)
7 Although the Court denied Plaintiff's request, Experian has maintained its position that it remains
8 willing to stipulate to extend the dispositive motion deadline. (*See* ECF No. 72-1, ¶ 22.)

9 On March 12, 2018, the parties met and conferred regarding some of Experian's responses
10 to Plaintiff's written discovery. During the meet and confer discussion, Experian agreed to
11 provide supplemental responses by March 16, 2018. Based on the foregoing, the parties jointly
12 propose and stipulate to a nine day extension of time to the dispositive motion deadline to
13 **March 23, 2018.** Good cause exists to grant the stipulated extension of this deadline so as to
14 permit Plaintiff sufficient time to prepare his dispositive motion in light of Experian's
15 forthcoming amended discovery responses.

1 **IT IS SO STIPULATED.**

2
3 DATED this 12th day of March, 2018.

JONES DAY

4
5 By: /s/ Cheryl L. O'Connor

6 Cheryl L. O'Connor (admitted *pro hac*
7 *vice*)

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*Attorneys for Defendant Experian
Information Solutions, Inc.*

14
15 DATED this 12th day of March, 2018.

KNEPPER & CLARK LLC

16
17 By: /s/ Miles N. Clark

18 Miles N. Clark

10040 W. Cheyenne Ave.

Suite 170-109

Las Vegas,, NV 89129

Attorneys for Plaintiff Thomas Foskaris

20
21 **IT IS SO ORDERED.**

22 Dated this 13th day of March, 2018.

23
24
25 
PEGGY ALLEN

UNITED STATES MAGISTRATE JUDGE